

The Service concurs that the primary purpose and needs for this project have been adequately stated and supported by written discussion and tabular data.

However, due to the magnitude of the impacts associated with this project we do not believe this project should be processed as an EA/FONSI as stated in the cover letter. Particularly since the meeting notes of June 19, 1997 for this project indicate that the Federal Highway Administration (FHWA) has decided to process this as an EA rather than an EIS simply to reduce review time. While we acknowledge that the document has been prepared in more detail than the usual EA there are, never-the-less, significant questions regarding mitigation for the loss of riverine wetlands, and compliance with Section 4(f) of the Department of Transportation Act of 1966.

Alternatives Analysis

Initially, three alternatives were carried forward for detailed study, an Improve Existing US 70 Freeway alternative, and two bypass corridors. The improvements on existing alignment would provide a six-lane, controlled-access, median-divided freeway with interchanges at six locations. This alternative would reduce congestion and delay, and provide adequate traffic service for a substantial volume of through traffic. However, this alternative would require the relocation of many businesses (57) adjacent to the existing route and the construction of adjacent parallel service roads to serve the remaining businesses. This alternative would add approximately \$40,000,000 over and above the cost for either of the two by-pass alternatives.

Two by-pass corridors providing a controlled-access, four-lane divided freeway on new alignment were selected as reasonable and feasible alternatives for the proposed project. Alternative 1, the outside preliminary Corridor C was developed to minimize impacts to existing development in the area, and Alternative 2, the inside preliminary Corridor A, was developed to minimize impacts to the natural areas in the Croatan National Forest. Alternative 2 has more social and economic impacts than Alternative 1, which is further from the City of Havelock, requires more wetland acreage and is more expensive than Alternative 1 because, being closer to the City, Alternative 2 requires almost 5 times as many residential re-locations than Alternative 1. However, being closer to the City, Alternative 2 fragments a much smaller portion of the Croatan National Forest.

After further assessment and coordination with resource agencies, Alternative 3 was developed to further reduce impacts. Alternative 3 is a compromise that combines advantages of the other two alternatives. As with 1 & 2, the natural resource agencies encouraged the placement of Alternative 3 as close to existing cleared power transmission line easements as possible to avoid additional fragmentation of wildlife habitat. Consequently, Alternative 3 was located along an existing cleared power transmission line easement connecting Alternative 1 near SR 1756 (Lake Road) with Alternative 2 to the north. To reduce fragmentation of the Croatan National Forest, Alternative 3 is closer to the City than Alternative 1, and to reduce the residential relocations in the vicinity of SR 1756 (Lake Road), Alternative 3 is further from the City than Alternative 2.